

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

PEOPLE FIRST OF ALABAMA,)	
<i>et al.,</i>)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Civil Action No. 2:20-cv-00619-AKK
)	
JOHN H. MERRILL, in his official)	
capacity as Secretary of State of)	
Alabama, <i>et al.,</i>)	
)	
<i>Defendants.</i>)	

DECLARATION OF GRACE NEWCOMBE

1. My name is Grace Newcombe. I am over the age of 19; I am qualified to give this declaration; and, I have personal knowledge of the matters set forth herein. I am over the age of 19 and the facts I have set out below are based upon my personal knowledge or the records of the Alabama Secretary of State's Office maintained in the ordinary course governmental business.

2. I am the press secretary of the Alabama Secretary of State.

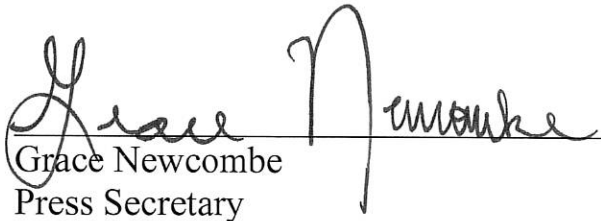
3. The Secretary regularly issues press releases for the purpose of informing the public of matters of interest involving the Secretary of State including elections and voting.

4. Secretary of State press releases are available online at:
<https://www.sos.alabama.gov/newsroom>.

5. When a press release is issued, electronic copies are sent to a variety of places including all electronic media (such as television and radio stations) who have requested electronic notifications, Alabama Probate Judges and county commissioners, elected officials (including legislators), the Capitol press corps, newspapers, as well as to any other individual or entity that has expressed an interest in receiving press releases.

6. At present, Secretary of State press releases are electronically sent to over 3,000 individuals and entities throughout Alabama.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on May 21, 2020.


Grace Newcombe
Press Secretary